

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN JON RONDESTVEDT,

Defendant.

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)
) **INFORMATION** CR 11-265 RHK
) (18 U.S.C. § 1347)
)
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)

THE UNITED STATES ATTORNEY CHARGES THAT:

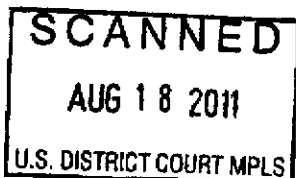
COUNT 1
(Health Care Fraud)

1. From on or about February 15, 2008, to in or about December 2010, in the State and District of Minnesota, the defendant,

STEPHEN JON RONDESTVEDT,

did willfully and knowingly participate in and execute a scheme to defraud Medicaid, a federal health benefit program, and to obtain money owned by and under the custody and care of Medicaid, namely approximately \$55,000 of Medicaid funds, by means of materially false and fraudulent pretenses, representations, and promises, in connection with the delivery of and payment for health care services.

2. The scheme to defraud the Medicaid program included the submission of false Medicaid claims to the Minnesota Department of Human Services ("DHS"), which administers the Medicaid program in Minnesota. Within the time period specified above, defendant knew that false Medicaid claims were being submitted to DHS through



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Universal Home Health Care, Inc. ("Universal Home Health"), a home health agency for which defendant worked.

3. The false claims included misrepresentations to DHS about who purportedly was providing Personal Care Assistant ("PCA") services to Medicaid recipient P.H., a known adult female. Services were billed using the names of PCAs who were not in fact providing any services to P.H. Those PCAs would receive payments in exchange for use of their names for billing purposes.

4. In furtherance of the scheme, defendant agreed with H.H., a known adult male and the husband of the Medicaid recipient P.H., to facilitate the fraudulent billing and kickback arrangement. Defendant, for example, identified the PCAs under whose names the fraudulent claims would be submitted, and delivered kickback payments to H.H.

5. All in violation of 18 U.S.C. Section 1347.

Dated: August 18, 2011

Respectfully submitted,

B. TODD JONES
United States Attorney



BY: David M. Genrich
Assistant U.S. Attorney
Attorney ID No. 0281311